0044465
031508

ERS 96-522

STATE OF WASHINGTON

DEPARTMENT OF HEALTH

DIVISION OF RADIATION PROTECTION

Airdustrial Center, Bldg. 5 • P.O. Box 47827 • Olympia, Washington 98504-7827

May 22, 1996

Mr. James E. Rasmussen
U.S. Department of Energy
P. O. Box 550
Richland, Washington 99352

JUN 1996 RECEIVED EDMC

RECEIVED
JUN 07 1996
DOE-RL / DCC

Dear Mr. Rasmussen:

Recently, staff from the Department of Health and the Environmental Restoration Contractor (ERC) met to establish air pathway monitoring requirements during the cleanup of the 100-BC-1 Operable Unit. In addition to air sampling, we will require a limited scope of air pathway near-field monitoring as required in WAC 246-247 to be conducted sometime during the 24 month duration of this project. We have requested a compilation of all current soil and vegetation data that will be used to establish necessary levels of monitoring.

The issue of ambient gamma measurement at the site was briefly discussed but, because it isn't part of the Department's air pathway program, no provisions were made for continuous (TLDs) or intermittent (PICs) measurement of ambient gamma levels. We acknowledge that controlling public access can reasonably be assured by health physics practices on site; however, the physical placement of boundaries on site does not consider exposure to the public in uncontrolled areas such as the Columbia River.

Currently, federal and state environmental radiation programs rely on the ability of environmental surveillance activities to characterize sources, and determine the locations and magnitude of exposure. Clearly, elevated exposure levels in the 100-BC-1 Area were detected during the recent Hanford aerial survey and assumed to have originated from the pilot cleanup activities at several sites in this area. Cleanup projects , scheduled to begin in this area this summer, represent a responsibility to directly assess public health impacts and will be used by the Department to establish environmental monitoring requirements at other Hanford cleanup sites.

It is my understanding that DOE Order 5400.1 requires that each DOE facility or activity that uses, generates, releases or manages significant quantities of hazardous materials to produce a written environmental monitoring plan that covers both effluent monitoring and environmental surveillance. It is also my understanding that the Hanford Site Environmental Monitoring Plan (EMP) issued on November 9, 1994 defines the requirements to be met by these programs. The use of the EMP insures that all environmental monitoring on Hanford follow consistent methods and protocols. It also insures sitewide compliance for impact to the environment and to the public.

It is clear from this that EMP requirements should be applied to cleanup units such as 100-BC-1. The Department recognizes that the site does not currently pose an acute public health hazard and concludes measuring changes in ambient gamma levels is necessary and essential to keep public exposure ALARA.

Please call me at your convenience so we may discuss this issue. I can be reached at 360-586-3306.

Sincerely,

John Erickson, Head
Environmental Radiation Section
Division of Radiation Protection

cc: A.W. Conklin, WDOH
Rich Holten, USDOE
Randy Brich, USDOE
John Hall, USDOE